

## REMARKS

Claim 9 is amended to incorporate the features of canceled claim 10. In addition, claim 13 is amended to correct antecedent with reference to the "slot."

The specification is amended on page 10 to replace the reference number "46" with the corrected number "406." This amendment clearly corrects a typographical error. In addition, Figures 10A and 12A are amended to include the reference numbers "310" and "454." It is submitted that one skilled in the art would clearly understand that these changes based upon the disclosure of the above-identified patent application at, for example, page 9, lines 19-31, and page 10, line 20 through page 11, line 2.

In view of the above comments, no new matter is introduced by this amendment, and entry thereof is requested. Upon entry, claims 1-9 and 11-16 are active in this application.

### Objection to the Drawings

The drawings stand objected to on the grounds that certain reference numbers are not present in the drawings. Page 10 of the specification has been amended so that reference number "46" ha been replaced with reference number "406." The reference number 168 is present in Figure 6. The reference numbers 310 and 454 are now present in amended Figures 10A and 12A, respectively. Enclosed with this amendment are replacement sheets including amended Figures 10A and 12A and annotated sheets showing the changes to Figures 10A and 12A.

Figure 11 is additionally amended as requested in the outstanding Office Action to remove a line. Enclosed are copies of a replacement sheet showing Figure 11 and an annotated sheet showing the change to Figure 11.

In view of the above comments, it is believed that the objection to the drawings has been removed. Accordingly, withdrawal of the objection is requested.

Rejection under 35 U.S.C. §112, Second Paragraph

Claims 13-16 stand rejected under 35 U.S.C. §112, second paragraph. In view of the amendment to claim 13, it is believed that this rejection has been removed. Accordingly, withdrawal of this rejection is requested.

Rejection under 35 U.S.C. §112, First Paragraph

Claim 10 stands rejected under 35 U.S.C. §112, first paragraph. This rejection is traversed.

It is pointed out that claim 10 is canceled, and the features of claim 10 are incorporated into claim 9. As described in the specification at page 9, lines 19-31, and in the context of Figures 10A-D, the "rotation pin 306 preferably includes a cam region 320 which, when the rotation pin 306 rotates, causes a compression of the tower walls 322 against the bracket assembly walls 324." It is pointed out that prior to rotation of the rotation pin 306, the tower 300 is provided within the bracket assembly 302 and the removable pin 308 is provided within the opening 310 on the bracket assembly 302 and the opening 312 in the tower 300. As shown in Figure 10D, the rotation pin 306 includes a cam region 320. Rotating the rotation pin 306 causes a rotation of the cam region 320 that results in the tower wall 322 compressing against the bracket assembly wall 324.

One having ordinary skill in the art would understand how the cam structure provided on the rotation pin allows the shoe area to compress against the shoe-receiving region as provided by claim 9 in view of the disclosure of the above-identified patent application at, for example, page 9, lines 19-31, and Figures 10A-D. In view of these comments, withdrawal of the rejection under 35 U.S.C. §112, first paragraph, is requested.

Rejection under 35 U.S.C. §102(b)

Claim 9 stands rejected 35 U.S.C. §102(b) over U.S. Patent No. 5,536,134 (*Hirooka*). In view of the amendment to claim 9, it is believed that this rejection has been obviated. Accordingly, withdrawal of this rejection is requested.

Rejection under 35 U.S.C. §103(a)

Claims 1-8 stand rejected under 35 U.S.C. §103(a) over *Hirooka* and Japanese Publication No. 11-269907. This rejection is traversed.

Independent claims 1, 6, and 8 of the above-identified patent application provide that the tower has a shoe area that includes a bottom opening constructed to fit over the shoe-receiving region of the first bracket assembly, and includes a fixed pin within the shoe area for engaging the receiving surface of the first bracket assembly. These features are neither disclosed nor suggested by *Hirooka* and Japanese Publication No. 11-269907.

*Hirooka* discloses a front loader coupling. According to the figures of *Hirooka*, the mast 9 fits within the mast mount 24. According to the present invention, the tower has a shoe area that fits over the shoe-receiving region. This feature is missing from *Hirooka*. Furthermore, *Hirooka* describes the presence of a pivot pin 26 within the mast mount 24, and discloses a removable connecting pin 27 that is inserted through the pin holes 17 of the mast 9 and the pin receiving slot 28 of the mast mount 24. See *Hirooka* at column 4, lines 27-34. Clearly, *Hirooka* fails to disclose the presence of a fixed pin within the tower as a required by the presently claimed invention.

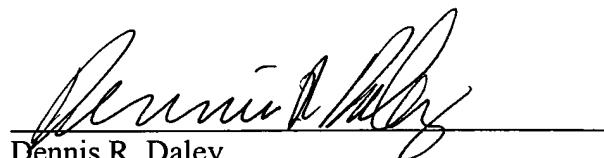
No reason has been provided to sufficiently explain why one having ordinary skill in the art would modify *Hirooka* to achieve the presently claimed invention. The outstanding Office Action merely refers to Figure 2 of Japanese Publication No. 11-269907. The relevance of Figure 2 of Japanese Publication No. 11-269907 is not apparent. Clearly, in the context of Figures 1 and 2 of Japanese Publication No. 11-269907, the "tower" does not have a shoe area that fits over a shoe-receiving region in the "bracket assembly."

In view of the above comments, the claimed invention would not have been suggested from *Hirooka* and Japanese Publication No. 11-269907. Accordingly, withdrawal of the rejection over *Hirooka* and Japanese Publication No. 11-269907 is requested.

It is believed that this application is in condition for allowance. Early notice to this effect is earnestly solicited.

Respectfully submitted,

MERCHANT & GOULD P.C.  
P.O. Box 2903  
Minneapolis, Minnesota 55402-0903  
(612) 332-5300



Dennis R. Daley  
Reg. No. 34,994  
DRD:jjb

Date: January 18, 2005



**Amendments to the Drawings:**

The attached sheets of drawings include changes to Figures 10A, 11, and 12A. These sheets, which include Figures 10A-10D, 11, and 12A-12B, replace the original sheets including Figures 10A-D, 11, and 12A-B. In Figure 10A, the previously omitted reference number 310 has been added. In Figure 11, a line has been removed. In Figure 12A, the previously omitted reference number 454 has been added.

Attachment: 3 Replacement Sheets

3 Annotated Sheets Showing Changes

FIG. 10A

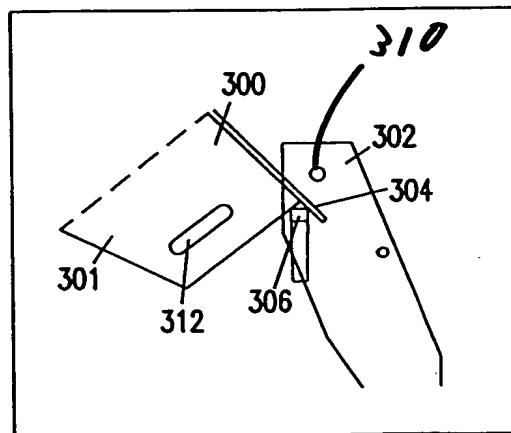


FIG. 10B

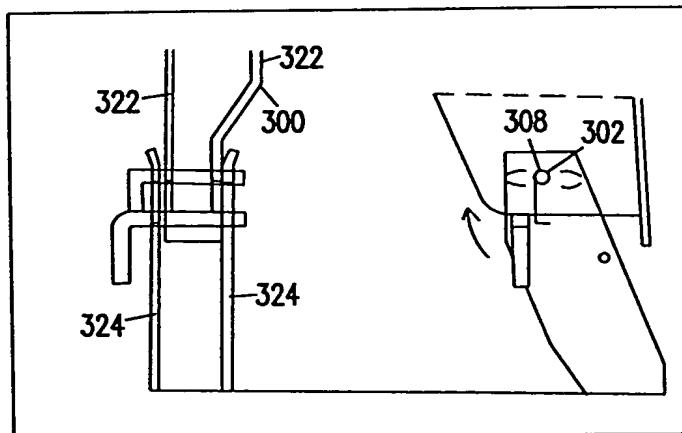


FIG. 10C

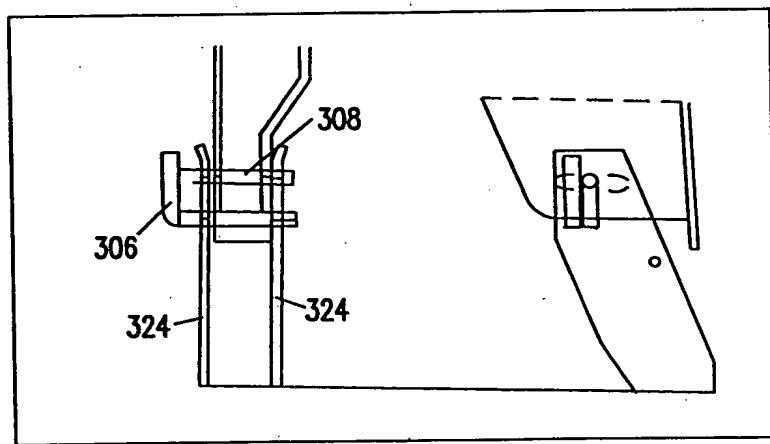


FIG. 10D

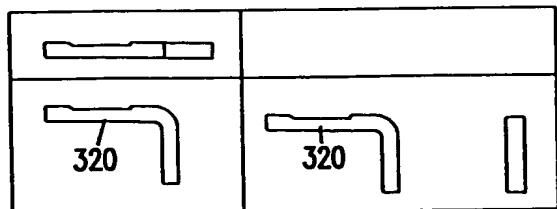


FIG. 11

